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1 February 2024

Hon. Egardo Ramos
United States District Court
Southern District of New York
40 Foley Square, Courtroom 619
New York, New York 10007
Transmitted by CMECF

Re: *Nunzio Calce, et al. v. City of New York, et al.*
No. 21-cv-8208 (ER)

Dear Judge Ramos:

I represent Plaintiffs in the above-captioned action, and I write jointly with Defendants' counsel, who has reviewed this letter in advance.

We write to request that the current briefing deadlines be extended by four weeks so that the parties can resolve a couple issues that arose at the end of the discovery period and agree on a stipulation covering basic facts pertinent to the summary judgment motions. Specifically, the parties propose that: Plaintiffs' summary judgment motion be due on 1 March 2024; Defendants' opposition and cross-motion be due on 29 March 2024; Plaintiffs' reply and opposition be due on 26 April 2024; and Defendants' reply be due on 10 May 2024. We also request that the fact discovery deadline be extended to 29 February 2024.

We appreciate the Court's consideration of this request. Please do not hesitate to contact either Ms. Schonfeld or myself if you have any questions or concerns.

Respectfully submitted,



David D. Jensen

cc: Samantha Schonfeld
New York City Law Department
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